

Hopkins, Ingrid

To: Ford, Nancy
Subject: FW: Benning NPDES Permit - Zinc Excursion Letter.4.5.2016
Attachments: x1460fm_040516_092636.pdf

Please add as SEV.

Ingrid H. Hopkins
NPDES Enforcement Branch (3WP42)
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103
(215) 814-5437

From: fmahvi@pepco.com [mailto:fmahvi@pepco.com]
Sent: Tuesday, April 05, 2016 9:45 AM
To: Hopkins, Ingrid <Hopkins.Ingrid@epa.gov>
Cc: wlmcnealy@pepco.com; george.nelson@pepcoholdings.com
Subject: Benning NPDES Permit - Zinc Excursion Letter.4.5.2016

Hello Ingrid,

The attached letter follows up on my April 1, 2016 telephone notification to report a daily maximum zinc excursion in a storm water sample collected on March 13, 2016 from Outfall 013.

Please feel free to contact me if you have any questions or need additional information.

Regards,

Fariba Mahvi
Environmental Services
Pepco Holdings, Inc.
Office: (202) 331-6641
Cell: (202) 345-7647

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701 Ninth Street, N.W.
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VIA ELECTRONIC MAIL
And U. S. MAIL

April 5, 2015

Ms. Ingrid H. Hopkins
Water Protection Division (3WP42)
US EPA - Region III
1650 Arch Street
Philadelphia, PA 19103-3029
(215) 814-5437
hopkins.ingrid@epa.gov

**RE: Benning Road Facility - NPDES Permit No. DC 0000094
Metal Excursion - Outfall 013Q**

Dear Ms. Hopkins,

This letter is a follow-up to my April 1, 2016 telephone notification to report the daily maximum zinc excursion in a storm water grab sample collected on March 13, 2016 from Outfall 013. I made the required telephone notification in accordance with NPDES permit condition VI.6.

On March 31, 2016, Pepco received the laboratory analysis indicating that the daily maximum concentration for zinc was exceeded as shown in the following table:

Analyte	Unit	Permit Limit Daily Max	Result
Zinc	ug/l	117.18	131

Pepco has not identified any specific cause of the zinc excursion. Pepco continues to implement the corrective measures identified in the Phase 3 TMDL Implementation Plan to reduce the concentrations of metals in storm water discharges from the site. Pepco has made substantial progress as supported by the storm water sampling results of the third and fourth quarters of 2015, which were in compliance with all of the daily maximum permit limits for metals.

Pepco is in the process of implementing additional corrective measures to ensure sustainable levels of compliance with the permit limits. Specifically, Pepco is currently soliciting bids for construction of a covered transformer storage area for offline or out-of-service transformers and other electric equipment prior to processing or disposal. This new covered structure will eliminate or minimize the exposure of staged or stored equipment that may be a source of metals in storm water that flows to the site's drainage system. Pepco is also working with AECOM Engineering to design and install a permanent storm water treatment system at the facility. AECOM has developed a preliminary design package and schedule, which are currently under review.

Please contact me at (202) 331-6641 or by electronic mail at fmahvi@pepco.com if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fariba Mahvi', with a long, sweeping horizontal line extending to the right.

Fariba Mahvi
Environmental Services
Pepco Holdings, Inc.